

Information Notice on GRDP Regulation

I. Website Information

Access Capital Partners (“Access”), as Data controller, processes personal data in compliance with the laws and regulations in force, and in particular the GDPR which came into force on 25 May 2018, the amended Data Protection Act of 6 January 1978 and the standards laid down by the CNIL (*Commission Nationale Informatique et Libertés*).

1. What is a personal data?

Personal data means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is defined as someone who can be identified, directly or indirectly, to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data related to racial or ethnic origins, political opinions, religious or philosophical beliefs, genetic data, biometric data or trade union membership are sensitive data.

2. Why ACCESS collects your personal data?

Personal data are collected for explicit and legitimate reasons and for determined purposes in a relevant and proportionate manner. Such data will not be used otherwise. Their collect is strictly needed for a define purpose.

Access Capital Partners collects and uses different types of personal data:

- Identification data (first name, last name, date of birth, postal address, etc.);
- Data on family status (marital status, number of children, etc.);
- Data on economic and financial situations;
- Information on the professional situations;
- Data necessary for anti-money laundering and terrorist financing processes;
- If necessary, and only with your explicit consent, Access may collect sensitive data, including health data.

Access does not collect nor process data relating to your racial or ethnic origins, political opinions, philosophical beliefs or trade union membership unless it is required by the regulation.

Personal data used by Access may be communicated directly by you or obtained from our service providers/third parties.

In some cases, Access may collect information without liaise directly with you e.g. when your contact details are provided by one of our business providers.

Personal data collected are used:

- To comply with Access legal and regulatory framework:
 - Anti-money laundering and financing of terrorism;
 - Tax fraud, tax audits and required notification;
 - Responding to potential requests from a duly authorized public or judicial authority.
- As part of your contractual relationship for the following main purposes:
 - The management and execution of your contracts;
 - Prospecting (emails, communication on social networks, any other communication, etc.).
- In the pursuit of a legitimate interest (deployment and development of your contracts):
 - Information system management;
 - Raising awareness among Access collaborators.

To respect your choices, Access may ask your consent for specific processing.

3. Who are recipients of your personal data?

Within the strict framework mentioned above, the recipients of your personal data may be::

- Duly authorized Access collaborators;
- Access Partners, processors and service providers;
- Managers involved in your agreement with Access;
- Persons interested in your agreement with Access;
- Financial and judicial authorities according to the perimeter authorized by law;
- Certain regulated professions such as lawyers and auditors.

4. Are your personal data transferred outside of the European Economic Area?

Your personal data are processed and stored on the territory of the European Union. However, in very rare cases, they may be transferred outside of the EU. In this case, you will be informed in detail, and specific measures will be taken to manage these transfers.

In the context of a transfer to a country outside the EEA whose level of protection has been recognized as adequate by the European Commission, your personal data may be transferred without any specific authorization.

In the case of a transfer to a country outside of the EEA whose level of protection has not been recognized as adequate by the European Commission, this transfer will be based on a derogation applicable to this specific situation or on the establishment of a system guaranteeing your personal data protection (such as the standard contractual clauses approved by the European Commission guaranteeing a level of data protection equivalent to that of an EEA country).

5. How long are your personal data kept?

Your personal data are stored for a limited period of time which does not exceed the time required for the processing purposes, legal prescription and regulation requirements.

Prospect data are kept for three years from the data collection or the last agreement signed between you and Access.

Customer data are kept for the duration of the contract, to which are added the legal limitation periods. Once this period has expired, your personal data will be deleted from ACCESS IT systems.

6. How is your personal data secured?

Appropriate physical and organisational security measures are implemented by Access to ensure the confidentiality and personal data protection.

Access requires any processor to provide appropriate measures to ensure personal data security and confidentiality.

7. What are your rights and how can you exercise them?

In accordance with the Regulation, you have the following rights:

- **Right of access:** at any time, you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- **Right to rectify:** where you consider that your personal data to be inaccurate or incomplete, you can require that such personal data be modified accordingly.
- **Right to erase:** you can require the deletion of your personal data, to the extent of it being permitted by law.

- **Right to object:** you can object to the processing of your personal data, on grounds relating to your particular situation. You have the absolute right to object to the processing of your personal data.
- **Right to data portability:** where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.
- **Right to withdraw your consent:** where you have given consent for the processing of your personal data, you have the right to withdraw your consent at any time.

If you wish to exercise the rights listed above, please send a letter or e-mail to the Personal Data Protection Referent, whose contact details are given below (Section 'How to contact the Personal Data Protection Referent?').

Please include a scan/copy of your identity card for identification purpose.

In accordance with applicable Regulation, you are also entitled to lodge a complaint with the competent Supervisory Authority (in France: CNIL).

8. How to contact the Personal Data Protection Referent?

If you have any questions about the use of your personal data, you can contact the Personal Data Protection Referent, the person responsible for personal data protection.

You can contact him:

- By email: gdpr@accesscp.com
- By postal address: 121 avenue des Champs Elysées – 75008 Paris, to Maud Michel

If the event of persistent disagreement concerning your personal data, you have the right to contact the CNIL ('*Commission Nationale Informatique et Liberté*') at the following address:

Commission Nationale Informatique et Libertés,
3 place de Fontenoy 75007 Paris
<https://www.cnil.fr/fr/vous-souhaitez-contacter-la-cnil>